

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

**Illinois Commerce Commission
On Its Own Motion**

**Notice of Inquiry Regarding Electric and
Natural Gas Service Safety and Reliability**

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20-NOI-02

**REPLY COMMENTS OF THE CHICAGO AREA LABORERS-
EMPLOYERS COOPERATION AND EDUCATION TRUST**

The Chicago Area Laborers-Employers Cooperation and Education Trust respectfully submits these Reply Comments to the Illinois Commerce Commission’s (“ICC”) Notice of Inquiry.

The Chicago Area Laborers-Employers Cooperation and Education Trust

The Construction & General Laborers’ District Council of Chicago and Vicinity (“Laborers’ District Council”) represents members of local unions who are affiliated with the Laborers International Union of North America (“LIUNA”) and employed by signatory contractors to perform work for Northern Illinois Gas Company d/b/a Nicor Gas Company (“Nicor Gas”) throughout northeastern Illinois. The Chicago Area Laborers-Employers Cooperation and Education Trust (“LECET”) is a 501(c)(5) labor-management organization that represents both LIUNA members and the signatory contractors who employ them.

In 2013, the Laborers’ District Council and Nicor Gas entered into their first project labor agreement. Pursuant to this agreement, Nicor Gas agreed to exclusively use signatory contractors employing LIUNA union members to perform certain types of covered work. This agreement has been regularly renewed and remains in place.

Since 2016 the trained, highly skilled, and safety-oriented workers and contractors represented by LECET have assisted Nicor in completing the following work (all figures approximate) pursuant to its Investing in Illinois program:

- Replacing 700 miles of aging mains.
- Laying 25 new miles of the Aux Sable pipeline and ten new miles of the Dubuque Pipeline.
- Installing 35 miles of storage field gathering lines.
- Adding 21,000 Hp of Compression and 2400 mmcf/day of Gas Conditioning.
- Installing 23,000 copper services and 52,000 services associated with main projects.

All in all, the above represents an approximately \$1.8 billion dollar investment by Nicor to modernize and improve its Illinois natural gas infrastructure.

Throughout these projects, Nicor's commitment to safety – addressed at length in its own Initial Comments – has been apparent to the union members and signatory contractors represented by LECET. This commitment is particularly evident with respect to Nicor's development and implementation of its Operator Qualification ("OQ") Plan. In LECET's experience, Nicor strictly enforces applicable OQ and other safety-related requirements for all relevant workers on Nicor projects. These requirements include four to five days of Midwest Energy Association (MEA) training (consisting of classroom training, testing, and field training) as well as OSHA training. Furthermore, a Nicor representative individually reviews and verifies all such workers' training credentials prior to their being permitted to perform any work on a Nicor site.

LECET appreciates the ICC's consideration of its Reply Comments and looks forward to doing whatever it can to assist LIUNA members, signatory contractors, Nicor, and the ICC in making the delivery of natural gas in Illinois as safe as possible.

Dated: October 13, 2020

Respectfully Submitted,

THE CHICAGO AREA LABORERS-
EMPLOYERS COOPERATION AND
EDUCATION TRUST


By: Chairman, James P. Connolly